

Federal Defenders
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March 9, 2018

Via ECF

The Honorable Jack B. Weinstein
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Keith Liwanag, 17-CR-677 (JBW)
Application to Adjourn

Your Honor:

At the last status conference, the Court set a date for trial to allow the parties to engage in meaningful plea negotiations pursuant to Fed. R. Evid. 11 since the case at hand carries a mandatory minimum of fifteen years at present. Due to delays with getting records from overseas, procuring a proper expert and admittance issues to Metropolitan Detention Center, the defense has not been able to submit its expert report to the government yet for review for plea negotiations that will serve judicial economy and possibly resolve this matter short of trial. Defense respectfully requests that the Court vacate its January 9, 2018 Order setting a trial date and schedule for motions in limine and convert April 2, 2018 into a status conference so an appropriate schedule for the resolution of the plea negotiations can be addressed by both parties. Defense counsel has discussed this matter with the government who has no objection.

Respectfully Submitted,

_____/s/
Michael Brown II
Attorney for Mr. Liwanag
(718) 407-7408

cc: Clerk of the Court (JBW) (by ECF)
AUSA Erin Reid
Keith Liwanag, (via mail)